I am a VRS interpreter. I urge you to allow exceptions to the 10 minute rule. There are rare occasions when an interpreter is not an appropriate fit for a Deaf consumer. To ensure the highest quality and premier customer service, there need to be allowable exceptions to the 10 minute rule. Also for calls which are legal in nature, to ensure the legal rights of rhe Deaf consumer, an appropriate (legally trained) interpreter should be used. Pre-conferencing is critical to the interpreting process. Interpreting without pre-conferencing in a fast-paced phone call environment, can be like asking an interpreter to read minds. Please consider the need for interpreters and Deaf consumers to pre-conference.

I see everyday the difference VRS has made in Deaf people's lives. VRS should unquestionably be a mandatory service. VRS is the only way to truly provide functional equivalence for Deaf telephone users. Thank you.